

California WIC Program Manual WIC 800-41

SECTION: FARMERS' MARKET NUTRITION PROGRAM

SUBJECT: FMNP Check Management

ITEM: FMNP Check Security and Integrity

Policy:

The Local Agency (LA) FMNP Coordinator shall control and provide accountability for the receipt, inventory, storage, transportation, distribution, issuance, reconciliation, security and disposition of all FMNP checks that are issued to participants, voided, or returned.

Required Procedures:

- I. Security
 - A. The LA shall ensure the integrity of the FMNP check booklet by maintaining separation of duties for FMNP check booklet handling and distribution as follows:
 1. Assign responsibilities to primary and secondary staff members for all processes that involve handling of FMNP check booklets.
 2. The primary staff person shall be responsible for receipt, shipment verification, storage, physical inventory and reporting of FMNP checks. The secondary staff person shall participate in the verification process of shipment, inventory, ISIS issuance and disposition of all FMNP check booklets. FMNP check booklets must not be within one person's control at any time.
 3. LA staff shall maintain separation of duties between providing nutrition education to participants, assigning FMNP check booklets in ISIS, and distributing FMNP check booklets to participants.

Refer to the Job Aid on Separation of Duties for Farmers' Market Nutrition Program for scenarios and guidance (WIC Appendix 950-02)

The following table provides an example of FMNP-specific tasks for check issuance and distribution.

Staff Person	FMNP functions
Person A	Educates and screens participants Provides and documents nutrition education received by the participants. Screens participants for their interest and ability to use FMNP checks at nearby authorized farmers' markets.
Person B	Verifies and Assigns FMNP check booklets Verifies participant's eligibility and assigns <u>one</u> FMNP check booklet per family for each season using ISIS.
Person C	Distributes FMNP check booklets Obtains the participant's or alternate's signature on the FMNP Check Booklet Issuance Log. Verifies signature and gives the FMNP check booklet to the participant.
Persons A and B	Duties may be combined
Persons A and C	
Persons B and C	Duties must <u>not</u> be combined.

4. FMNP check booklets shall never be left unattended or unsecured at WIC sites or during transit to and from a Farmers' Market.
5. FMNP check booklets must be stored in a secure, locked location with the keys accessible only to authorized WIC local agency staff.

B. Alternate Procedures to Separation of Duties

1. LA may request approval of an alternate procedure to the separation of duties requirement if there is only one staff member at any given WIC FMNP check distribution location.

- a. To request approval, LA shall complete the document in the WPM Appendix 950-01 (*Alternate Procedures for Ensuring FMNP Check Security*) and submit to the LA's corresponding SA Regional Advisor for review and approval.
 - b. If the alternate procedure from separation of duties is approved, LA shall put into place the continuous quality assurance procedure, as identified on the Alternate Procedure Request form, to prevent fraud and abuse.
 - c. Approved Alternate Procedures for Separation of Duties requests are valid for up to three years or expiration of the contract, whichever comes first.
2. In the event of a disaster, the State WIC Program shall determine if a short term exemption from the separation of duties requirement is necessary; the LA(s) affected; and the minimum length of time needed for the exemption. If approved, the State WIC Program will notify the affected LA(s) of the temporary exemption and timeframe.

II. Limited Access

- A. Only authorized WIC staff shall have access to locked storage areas.
- B. Access to the locked area by non-authorized WIC staff, non-WIC staff and participants shall be restricted.

III. Lost, stolen, voided, expired, or damaged FMNP check booklets

- A. The State WIC Program does not replace lost, stolen, expired, or damaged FMNP checks.
 1. If checks are lost or stolen, the LA shall:
 - a. Complete the WIC FMNP "Lost or Stolen Check Report" form (WPM Appendix 950-03) and report to the State within five (5) business days of the incident;
 - b. Document lost or stolen FMNP checks in ISIS (WPM Appendix 950-07);
 - c. Record lost or stolen checks on the "FMNP Check Booklet Issuance Log" (WPM Appendix 950-06);
 - d. Document lost or stolen checks on "FMNP End of Year Report" as described below.
 2. If checks are expired or damaged, the LA shall:

- a. Record expired or damaged checks on the "FMNP Check Booklet Issuance Log"
 - b. Document damaged checks on "FMNP End-of-Year Report" as described below;
 - c. Shred all expired or damaged checks by following the procedures in the "End of Season Check Booklet Shredding" below;
3. If check are returned unused by participants, the LA shall:
- a. Record returned checks on the "FMNP Check Booklet Issuance Log"
 - b. Record returned checks in ISIS FMNP Booklet Inventory page
 - 1. If checks are returned unused prior to September 30, they can be re-issued to a different participant by following the ISIS Job Aids (Appendix 950-07)
 - 2. If checks are returned unused after September 30, they cannot be re-issued to a different participant and the status code "V" must be used in ISIS FMNP Booklet Inventory page.
 - c. Any checks that cannot be reissued must be shredded by the end of season by following the procedures in the "End of Season Check Booklet Shredding" below.

IV. Check Booklet Reconciliation at End of Season

- A.** At the end of each FMNP season, FMNP check booklets that are unissued, returned, void, expired, or damaged that remain at the WIC Local Agency or have been lost or stolen must be reported to the State. ***This report is not required if all checks have been successfully issued.***

Local agency shall:

- 1. Complete the "FMNP End of Year" report (Appendix 950-04) by the deadline established by SA, usually in the second week of November.
- 2. Email or fax the "FMNP End of Year" report to the State FMNP Coordinator. Maintain a copy on file for 3 years.
- 3. Send amendments to the State WIC Program if checks are returned by participants after the "FMNP End of Year" report is due.
- 4. Shred all FMNP checks remaining at the Local Agency by following the procedures in this policy.

V. Check Booklet Shredding at End of Season

- A.** FMNP check booklet shredding guidelines are as follows:

1. Record all serial numbers as unused in the “ISIS FMNP Inventory” screen (Appendix 950-07).
2. Record all serial numbers on the “FMNP Check Booklet Issuance Log” as unused and destroyed.
3. After recording the unused check booklets in ISIS and on the “FMNP Check Booklet Issuance Log,” the FMNP Coordinator must verify that staff (other than themselves) shreds the checks.
4. Do not mail unused FMNP checks to the State WIC Program.
5. The FMNP Coordinator must confirm with site supervisors that all voided, expired, or damaged FMNP checks are properly destroyed.

Authority

7CFR 248.4 11i

7 CFR 248.10 f 1,2,3

7 CFR 248.10 h